

-) **MDL No. 1456**
-) **Master File No. 01-12257-PBS**
-) **Subcategory Case No. 06-11337**

) **Judge Patti B. Saris**

) **Magistrate Judge**
) **Marianne B. Bowler**

)

I, Steven U. Ross, do hereby declare as follows:

2. On behalf of Plaintiff State of California, I am submitting with this declaration

ts in support of Plaintiffs' Opposition to Sandoz Inc.'s Motion for Summary Judgment and

reenced in Plaintiffs' Response to Defendant Sandoz Inc.'s Local Rule 56.1 Statement of

puted Facts In Support of Its Motion for Summary Judgment and Plaintiffs' Statement of

onal Undisputed Material Facts In Opposition to Sandoz Inc.'s Motion For Summary

ent.

3. The following exhibits are true and correct copies of the materials described:

1

Exhibit No.	Description
3	Deposition of Mike Namba, taken April 23, 2009, selected pages
4	Deposition of Maureen Tooker, taken September 21, 2008, selected pages
5	Deposition of J. Kevin Gorospe, taken September 22, 2008, selected pages
6	Rule 30(b)(6) Deposition of California Department of Health Care Services (J. Kevin Gorospe), taken December 3, 2008, selected pages
7	Rule 30(b)(6) Deposition of Generic Pharmaceutical Association (Shawn Brown), taken February 10, 2009, selected pages and exhibits
8	Rule 30(b)(6) Deposition of Sandoz, Inc. (Ronald H. Hartmann), taken May 6, 2009, selected pages
9	Deposition of Stanley L. Rosenstein, taken November 6, 2008, selected pages
10	Deposition of Frank Stiefel, taken January 27, 2009, selected pages
11	Deposition of Kevin Galownia, taken June 11, 2007, selected pages (<i>Designated Highly Confidential - Filed Under Seal</i>)
12	Deposition of J. Kevin Gorospe, taken March 19, 2008, selected pages

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 21, 2009, at San Diego, California.

/s/ Steven U. Ross
STEVEN U. ROSS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on December 21, 2009, a copy to Lexis-Nexis for posting and notification to all parties.

/s/ Steven U. Ross
STEVEN U. ROSS